Document 70

Filed 07/26/2004

Page 1 of 51

Oce North America, Incorporated

Frederick H. Colen Barry J. Covne Joshua S. Bish Reed Smith LLP 435 Sixth Avenue Pittsburgh, PA 15219

Clyde Siebman Siebman Reynolds, Burg & Phillips, LLP 300 North Travis Street Sherman, Texas 75090-0070

### Onkyo USA Corporation

Robert F. Zielinski Wolf, Block, Schorr and Solis-Cohen LLP 1650 Arch Street, 22<sup>nd</sup> Floor Philadelphia, Pennsylvania 19103

Barry J. Bendes Wolf, Block, Schorr and Solis-Cohen LLP 250 Park Avenue New York, New York 10177

### PalmOne, Incorporated

Mark D. Flanagan Bart E. Volkmer Wilson Sonsini Goodrich & Rosati 650 Page Mill Road Palo Alto, California 94303-1050

M. Craig Tyler Wilson Sonsini Goodrich & Rosati 8911 Capital of Texas Highway North Westech 360, Suite 3350 Austin, Texas 78759-7247

Panasonic Communications Corporation of America/ Panasonic Mobile Communications Development Corporation of U.S.A. Morton Amster Abraham Kasdan Joseph Casino Amster, Rothstein & Ebenstein, LLP 90 Park Avenue New York, New York 10016

Eric M. Albritton Albritton Law Firm P.O. Box 2649 Longview, Texas 75606-2649

## Ricoh Corporation Anthony C. Roth Morgan Lewis & Bockius LLP

111 Pennsylvania Avenue, N.W.

Washington, D.C. 20004

Robert J. Hollingshead Morgan Lewis & Bockius LLP Shin-Tokyo Building, 9<sup>th</sup> Floor 3-1 Marunouchi 3 chome Chiyoda-ku, Tokyo 100-0005, Japan

Eric M. Albritton Albritton Law Firm P.O. Box 2649 Longview, Texas 75606

## Riverdeep, Incorporated (d.b.a. Broderbund)

M. Matthews Hall Kolisch Hartwell, P.C. 200 Pacific Building 520 S.W. Yamhill Street Portland, Oregon 97204

#### Savin Corporation

Robert J. Hollingshead Morgan Lewis & Bockius LLP Shin-Tokyo Building, 9<sup>th</sup> Floor 3-1 Marunouchi 3 chome Chiyoda-ku, Tokyo 100-0005, Japan

Eric M. Albritton Albritton Law Firm P.O. Box 2649 Longview, Texas 75606

#### Thomson Inc.

E. Lee Haag
Marc L. Deflache
Richard S. Zembek
Andrew Price
Fulbright & Jaworski
1301 McKinney
Suite 5100
Houston, TX 77010-3095

Guy N. Harrison Attorney at Law 217 North Center Longview, Texas 75601

#### **Xerox Corporation**

James P. Bradley William O. Fifield Sidley Austin Brown & Wood LLP 717 North Harwood Dallas, Texas 75201

Lance Lee

Young Pickett & Lee 4122 Texas Boulevard

Texarkana, Texas 75503

S. Calvin Capshaw

## **EXHIBIT 1**

### IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

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Compression Labs, Incorporated,	) }
Plaintiff,	
v.	) C.A. No. 2:04cv158
	)
1. Agfa Corporation,	) Judge Folsom
2. Apple Computer, Incorporated,	)
3. Axis Communications, Incorporated,	) JURY
4. Canon, USA, Incorporated,	)
_	)
5. Concord Camera Corporation,	)
6. Creative Labs, Incorporated,	
7. Eastman Kodak Company,	·)
8. Fuji Photo Film U.S.A.,	
9. Fujitsu Computer Products of America,	)
10. Gateway, Incorporated,	)
11. Hewlett-Packard Company,	)
12. JASC Software,	)
13. JVC Americas Corporation,	)
14. Kyocera Wireless Corporation,	)
15. Macromedia, Incorporated,	)
16. Matsushita Electric Corporation of	FIRST AMENDED COMPLAINT
America,	)
17. Mitsubishi Digital Electronics America,	)
Incorporated,	)
18. Océ North America, Incorporated,	)
19. Onkyo U.S.A. Corporation,	
20. PalmOne, Incorporated,	
21. Panasonic Communications Corporation	
of America,	
22. Panasonic Mobile Communications	
Development Corporation of USA,	
23. Ricoh Corporation,	
24. Riverdeep, Incorporated (d.b.a.	)
Broderbund),	)
25. Savin Corporation,	)
26. Thomson, Incorporated	)
27. Xerox Corporation,	)
Defendants.	) )

Compression Labs, Inc. ("CLI") for its Complaint against Defendants alleges as follows:

#### NATURE OF THE ACTION

1. This is a patent infringement action to stop each Defendant's unauthorized and infringing sale, offers to sell, use and importation of products incorporating CLI's patented technology. CLI seeks injunctive relief to stop Defendants from continuing to infringe CLI's valuable patent rights, as well as monetary damages.

#### THE PARTIES

- 2. Plaintiff, CLI, is a corporation existing and organized under the laws of Delaware and has its principal place of business at 108 Wild Basin Drive, Austin, TX 78746.
- 3. Defendant Agfa Corporation is a corporation existing and organized under the laws of Delaware and has its principal place of business at 100 Challenger Road, Ridgefield Park, NJ 07660.
- 4. Defendant Apple Computer, Incorporated is a corporation existing and organized under the laws of California and has its principal place of business at 1 Infinite Loop, Cupertino, CA 95014.
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- 24. Defendant Panasonic Mobile Communications Development Corporation of USA is a corporation existing and organized under the laws of Delaware and has its principal place of business at 1225 Northbrook Parkway, Suite 2-352, Suwanee, GA 30024.
- 25. Defendant Ricoh Corporation is a corporation existing and organized under the laws of Delaware and has its principal place of business at 5 Dedrick Place, West Caldwell, NJ 07006.
- 26. Defendant Riverdeep, Incorporated (d.b.a. Broderbund) is a corporation existing and organized under the laws of Delaware and has its principal place of business at 500 Redwood Boulevard, Novato, CA 94947.

- 27. Defendant Savin Corporation is a corporation existing and organized under the laws of Delaware and has its principal place of business at 333 Ludlow Street, Stamford, CT 06902.
- 28. Defendant Thomson, Incorporated is a corporation existing and organized under the laws of Delaware and has its principal place of business at 10330 North Meridian Street, Indianapolis, IN 46290.
- 29. Defendant Xerox Corporation is a corporation existing and organized under the laws of New York and has its principal place of business at 800 Long Ridge Road, Stamford, CT 06904.

#### JURISDICTION AND VENUE

- 30. This action for patent infringement arises under the Patent Laws of the United States, 35 U.S.C. §§ 1 et seq., and in particular 35 U.S.C. §§ 271, 281, 283, 284 and 285. This Court has jurisdiction over the subject matter of this action under 28 U.S.C. 1338(a).
- 31. This Court has personal jurisdiction over each of the Defendants and venue is proper in this Court pursuant to 28 U.S.C. §§ 1391 and 1400.

#### **COUNT 1 – PATENT INFRINGEMENT**

- 32. This case involves technology used to process digital signals. CLI owns patents relating to such technology, and CLI invested substantial amounts in related research and development.
- 33. United States Patent No. 4,698,672 entitled "Coding System for Reducing Redundancy" (hereinafter "the '672 patent"), was duly and legally issued on October 6, 1987. CLI is an owner of the '672 patent and, pursuant to an agreement with its co-owner, has the exclusive rights to sue and recover for infringement thereof with respect to the Accused Devices, as hereinafter defined. A copy of the '672 patent is attached as Exhibit A.
- 34. Defendants offer to sell, sell, use, and/or import into the United States devices, at least portions of which are designed to be at least partly compliant with the JPEG standard as defined by CCITT Recommendation T.81 approved on September 18, 1992, entitled

"Information Technology—Digital Compression and Coding of Continuous Tone Still Images—Requirements and Guidelines," the identical text of which is also published as ISO/IEC International Standard 10918-1, or with any version or variance thereof defining a lossy compression scheme (hereinafter referred to as "the Accused Devices"). The Accused Devices are covered by, and carry out methods that are covered by, one or more claims of the '672 patent.

- 35. Through their actions including offering to sell, selling, using and importing the Accused Devices, Defendants have infringed the aforementioned patent and actively induced others to infringe and contributed to the infringement by others of the '672 patent in the United States, including within the jurisdiction of this Court. Certain of the Defendants also have made the Accused Devices in the United States, and such Defendants have also infringed the aforementioned patent by their actions in this regard.
- 36. CLI is likely to be irreparably harmed by Defendants' infringement, inducement of others to infringe, and contributory infringement of the '672 patent. CLI has no adequate remedy at law.

WHEREFORE, CLI prays for judgment that:

- A. United States Patent No. 4,698,672 has been infringed, directly, by inducement, and/or contributorily, by each Defendant;
- B. Each Defendant, its officers, agents, servants and employees, and those persons in active concert and participation with any of them, be permanently enjoined from the direct or contributory infringement of, and from inducing others to infringe, United States Patent No. 4,698,672;
- C. CLI be awarded damages sufficient to compensate it for each Defendant's infringement, contributory infringement and inducement of others to infringe, that such damages

be increased to three times the amount found or assessed pursuant to 35 U.S.C. § 284, and that such damages be awarded to CLI with prejudgment interest;

- D. That this case be declared exceptional pursuant to 35 U.S.C. § 284 and that CLI be awarded its attorney fees, costs and expenses in this action; and
  - E. CLI be awarded such other and further relief as the Court may deem just.

CLI DEMANDS A TRIAL BY JURY.

Respectfully submitted, Compression Labs, Inc.

Dated: June 21, 2004

Stephen G. Rudisill (attorney-in-charge)

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Russell J. Genet

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Justin D. Swindells

Illinois Bar No.: 6257291 jswindells@jenkens.com

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Fax (312) 425-3909

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P.O. Drawer 1249

Marshall, Texas 75670-1249

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115 North Wellington, Suite 200

P.O. Box 876

Marshall, Texas 75670

Tel. (903) 935-1665

Fax (903) 935-1797

ATTORNEYS FOR PLAINTIFF

## CERTIFICATE OF SERVICE

I hereby certify that on the 2/5 tday of June, 2004, a true and correct copy of the foregoing FIRST AMENDED COMPLAINT was deposited in the United States Mail, postage prepaid, and addressed to the following counsel of record:

Adobe Systems, Incorporated	Creative Labs, Incorporated	
Robert T. Halsam	Attention: Legal Department	
Heller Ehrman White & McAuliffe LLP	1901 McCarthy Boulevard	
275 Middlefield Road	Milpitas, California 95035	
Menlo Park, California 94025-3506		
Agfa Corporation	Eastman Kodak Company	
Attention: Legal Department	Nicholas H. Patton	
100 Challenger Road	Robert W. Schroeder, III	
Ridgefield Park, New Jersey 07660	Patton, Tidwell & Schroeder, LLP	
	4605 Texas Boulevard	
	P.O. Box 5398	
	Texarkana, Texas 75505	
Apple Computer Incorporated	Fuji Photo Film U.S.A.	
Herschel Tracy Crawford	Attention: Legal Department	
Eric H. Findlay	200 Summit Lake Drive	
Ramey & Flock	Valhalla, New York 10595	
100 East Ferguson, Suite 500		
Tyler, Texas 75702		
Axis Communications, Incorporated	Fujitsu Computer Products of America	
Barry W. Graham	Michael M. Murray	
Finnegan, Henderson, Farabow, Garrett &	Christopher Chalsen	
Dunner, L.L.P.	Milbank, Tweed, Hadley & McCloy LLP	
1300 I Street, N.W.	1 Chase Manhattan Plaza	
Washington, D.C. 20005-3315	New York, New York 10005-1413	
Canon U.S.A., Incorporated	Gateway, Incorporated	
Attention: Legal Department	W. Bryan Farney	
One Canon Plaza, Lake Success	Darryl J. Adams	
New York, New York 10042	Dewey Ballantine LLP	
	401 Congress Avenue	
	Suite 3200	
	Austin, Texas 78701-2478	
Concord Camera Corporation	Hewlett-Packard Company	
Kerry Sisselman	Sean C. Cunningham	
400 Hollywood Boulevard	Bruce Watrous	
Suite 659 North	Gray Cary Ware & Freidenrich LLP	
Hollywood, Florida 33021	401 B Street, Suite 2000	
	San Diego, CA 92101-4240	

1,000		
JASC Software	Matsushita Electric Corporation of America	
Deakin T. Lauer	Morton Amster	
Merchant & Gould PC	Abraham Kasdan	
3200 IDS Center	Joseph Casino	
80 South Eighth Street	Amster, Rothstein & Ebenstein, LLP	
Minneapolis, Minneapolis 55402	90 Park Avenue	
	New York, New York 10016	
Franklin A. Poff, Jr.		
Crisp, Boyd & Poff, LLP	Eric M. Albritton	
2301 Moores Lane	Albritton Law Firm	
P.O. Box 6297	P.O. Box 2649	
Texarkana, Texas 75505	Longview, Texas 75606-2649	
JVC Americas Corporation	Mitsubishi Digital Electronics America,	
Attention: Legal Department	Incorporated	
1700 Valley Road, Suite 1	Attention: Legal Department	
Wayne, New Jersey 07470	9351 Jeronimo Road	
	Irvine, California 92618	
Kyocera Wireless Corporation	Oce North America, Incorporated	
Jennifer P. Ainsworth	Frederick H. Colen	
Wilson, Sheehy, Knowles, Robertson &	Reed Smith LLP	
Cornelius, P.C.	435 Sixth Avenue	
315 East Fifth Street	Pittsburgh, PA 15219	
Tyler, Texas 75701	,	
	Clyde Siebman	
	Siebman Reynolds Burg & Phillips, LLP	
	Federal Courthouse Square	
	300 N. Travis St.	
	Sherman, Texas 75090	
Macromedia Incorporated	Onkyo USA Corporation	
Charlene Morrow	Robert F. Zielinski	
Fenwick & West LLP	Wolf, Block, Schorr and Solis-Cohen LLP	
801 California Street	1650 Arch Street, 22 <sup>nd</sup> Floor	
Mountainview, California 94041	Philadelphia, Pennsylvania 19103	
The state of the s	i madoipma, i cinisyivama 19105	
Harry Lee Gillam, Jr.	Barry J. Bendes	
Melissa Smith	Wolf, Block, Schorr and Solis-Cohen LLP	
Gillam & Smith LLP	250 Park Avenue	
110 South Bolivar Street	New York, New York 10177	
Suite 204	TOTAL TOTAL TOTAL TOTAL	
Marshall, Texas 75670		
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Savin Corporation	
Attention: Legal Department	
333 Ludlow Street	
Stamford, Connecticut 06902	
Thomson, Incorporated	
Attention: Legal Department	
10330 North Meridian Street	
Indianapolis, Indiana 46290	
Xerox Corporation	
Attention: Legal Department	
800 Long Ridge Road	
Stamford, Connecticut 06904	

## **EXHIBIT 2**

CONFIDENTIAL

REDACTED

**EXECUTION COPY** 

# FULLY PAID-UP PATENT LICENSE AGREEMENT

This Patent License Agreement ("Agreement"), dated and effective as of the 1/2th day of 1/2th 2003, is made and entered into in duplicate originals by and between FORGENT NETWORKS, INC. ("Forgent") and its wholly-owned subsidiary, COMPRESSION LABS, INC. ("CLP"), each a corporation having its principal office and place of business at 108 Wild Basin Rd., Austin, TX 78746 (hereinafter jointly referred to as "Grantor") and MOTOROLA, INC., with principal offices located at 1303 E. Algonquin Road, Schaumburg, Illinois 60196 (hereinafter referred to as "Grantee"), acting on behalf of itself and in the interest of its Subsidiaries. Grantee and its aforesaid Subsidiaries are hereinafter singularly and jointly referred to as "Licensee."

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Article 4 - Release of MPEG-4 rights; Control of Litigation by Grantor, Etc.

4.2 Licensee and its subsidiaries, including GI, hereby conveys, grants, assigns and otherwise

J.P

#### CONFIDENTIAL

releases to Grantor the sole, exclusive and unrestricted right and power to enforce, by licensing, litigation or otherwise, the Jointly Owned Patents in the JPEG Standard field of use from time to time, and to defend any action or actions, involving such field of use, without any accounting to or other rights of Licensee, GI or their respective subsidiaries and agree to execute such other documents as may be reasonably required from time to time by Grantor to make, in Grantor's sole judgment, the foregoing efficient and effective. Further, Licensee, on behalf of itself and on behalf of its subsidiaries, 'including GI, hereby agrees that Grantor shall have the full sole, exclusive and unrestricted right and power to license third parties and to initiate, control and pursue to judgment or settlement one or more actions under the Jointly Owned Patents, at Grantor's sole cost and expense, based upon the infringement thereof with respect to all fields of use, except the Broadcast Business and the MPEG-4 field of use, and the recovery or recoveries from such actions, whether by settlement or judgment, shall inure solely to the benefit of Grantor; and Licensee, GI and its subsidiaries shall have no interest in any such settlements or recoveries.

Agreement, dated as of June 24, 1996, between Grantor and GI, as successor in interest to Charger Industries, Inc., as amended by that Amendment to License and Co-Ownership Agreement, dated as of July 1, 1997, between Grantor and GI, as successor in interest to Magnitude Compression Systems, Inc. and that Agreement Relating to License and Co-Ownership Agreement, dated effective as of January 25, 2002, between Grantor and GI shall continue in full force and effect, except as provided for herein.

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Case 2:04-cv-00158-DF Document 70 Filed 07/26/2004 Page 36 of 51

CONFIDENTIAL

General Instrument Corporation, for purposes of confirming its agreements in Article 4 hereof

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## EXHIBIT 3

# IN THE UNITED STATES DISTRICT COURT OF TEXAS OF THE EASTERN DISTRICT OF TEXAS OF THE EASTERN MARSHALL DIVISION TX SASTERN MARSHALL

Compression Labs, Incorporated,	)	8Y	U Farence - In-
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4. Axis Communications, Incorporated,	)		
5. Canon, USA, Incorporated,	)		
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12. Hewlett-Packard Company,	)		
13. JASC Software,	)		
14. JVC Americas Corporation,	)		
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of America,	)		
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25. Riverdeep, Incorporated (d.b.a.	)		
Broderbund),	)		
26. Savin Corporation,	)		
27. Thomson S.A.,	)		
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D-f., 1.	)		
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- 25. Defendant Panasonic Mobile Communications Development Corporation of USA is a corporation existing and organized under the laws of Delaware and has its principal place of business at 1225 Northbrook Parkway, Suite 2-352, Suwanee, GA 30024.
- 26. Defendant Ricoh Corporation is a corporation existing and organized under the laws of Delaware and has its principal place of business at 5 Dedrick Place, West Caldwell, NJ 07006.

- 27. Defendant Riverdeep, Incorporated (d.b.a. Broderbund) is a corporation existing and organized under the laws of Delaware and has its principal place of business at 500 Redwood Boulevard, Novato, CA 94947.
- 28. Defendant Savin Corporation is a corporation existing and organized under the laws of Delaware and has its principal place of business at 333 Ludlow Street, Stamford, CT 06902.
- 29. Defendant Thomson S.A. is a corporation existing and organized under the laws of Delaware and has its principal place of business at 10330 North Meridian Street, Indianapolis, IN 46290.
- 30. Defendant Xerox Corporation is a corporation existing and organized under the laws of New York and has its principal place of business at 800 Long Ridge Road, Stamford, CT 06904.

## JURISDICTION AND VENUE

- 31. This action for patent infringement arises under the Patent Laws of the United States, 35 U.S.C. §§ 1 et seq., and in particular 35 U.S.C. §§ 271, 281, 283, 284 and 285. This Court has jurisdiction over the subject matter of this action under 28 U.S.C. 1338(a).
- 32. This Court has personal jurisdiction over each of the Defendants and venue is proper in this Court pursuant to 28 U.S.C. §§ 1391 and 1400.

## **COUNT 1 – PATENT INFRINGEMENT**

- 33. This case involves technology used to process digital signals. CLI owns patents relating to such technology, and CLI invested substantial amounts in related research and development.
- 34. United States Patent No. 4,698,672 entitled "Coding System for Reducing Redundancy" (hereinafter "the '672 patent"), was duly and legally issued on October 6, 1987. CLI is an owner of the '672 patent and, pursuant to an agreement with its co-owner, has the exclusive rights to sue and recover for infringement thereof with respect to the Accused Devices, as hereinafter defined. A copy of the '672 patent is attached as Exhibit A.

- 35. Defendants offer to sell, sell, use, and/or import into the United States devices, at least portions of which are designed to be at least partly compliant with the JPEG standard as defined by CCITT Recommendation T.81 approved on September 18, 1992, entitled "Information Technology—Digital Compression and Coding of Continuous Tone Still Images—Requirements and Guidelines," the identical text of which is also published as ISO/IEC International Standard 10918-1, or with any version or variance thereof defining a lossy compression scheme (hereinafter referred to as "the Accused Devices"). The Accused Devices are covered by, and carry out methods that are covered by, one or more claims of the '672 patent.
- 36. Through their actions including offering to sell, selling, using and importing the Accused Devices, Defendants have infringed the aforementioned patent and actively induced others to infringe and contributed to the infringement by others of the '672 patent in the United States, including within the jurisdiction of this Court. Certain of the Defendants also have made the Accused Devices in the United States, and such Defendants have also infringed the aforementioned patent by their actions in this regard.
- 37. CLI is likely to be irreparably harmed by Defendants' infringement, inducement of others to infringe, and contributory infringement of the '672 patent. CLI has no adequate remedy at law.

WHEREFORE, CLI prays for judgment that:

- A. United States Patent No. 4,698,672 has been infringed, directly, by inducement, and/or contributorily, by each Defendant;
- B. Each Defendant, its officers, agents, servants and employees, and those persons in active concert and participation with any of them, be permanently enjoined from the direct or contributory infringement of, and from inducing others to infringe, United States Patent No. 4,698,672;
- C. CLI be awarded damages sufficient to compensate it for each Defendant's infringement, contributory infringement and inducement of others to infringe, that such damages

be increased to three times the amount found or assessed pursuant to 35 U.S.C. § 284, and that such damages be awarded to CLI with prejudgment interest;

- D. That this case be declared exceptional pursuant to 35 U.S.C. § 284 and that CLI be awarded its attorney fees, costs and expenses in this action; and
  - E. CLI be awarded such other and further relief as the Court may deem just.

CLI DEMANDS A TRIAL BY JURY.

Respectfully submitted, Compression Labs, Inc.

Dated: April 22, 2004

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## Exhibit A

## United States Patent [19]

Chen et al.

[11] Patent Number:

4,698,672

[45] Date of Patent:

Oct. 6, 1987

## [54] CODING SYSTEM FOR REDUCING REDUNDANCY

[75] Inventors: Wen-bsiung Chen, Sunnyvale; Daniel J. Klenke, Milpitas, both of Calif.

[73] Assignee: Compression Labs, Inc., San Jose,

Calif.

[21] Appl. No.: 923,630

[22] Filed: Oct. 27, 1986

[56]

#### References Cited

#### U.S. PATENT DOCUMENTS

4,302,775	11/1981	Widergren	358/136
4,476,495	10/1984	Fujisawa	358/262
4,520,490	5/1985	Wei	. 375/27
4,558,370	12/1985	Mitchell	358/262
4,633,325	12/1986	Usubuchi	358/133

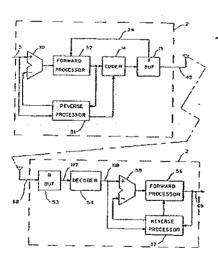
Primary Examiner—Howard W. Britton Attorney, Agent, or Firm—Fliesler, Dubb, Meyer & Lovejoy

## [57]

#### ABSTRACT

The present invention relates to methods and apparatus for processing signals to remove redundant information thereby making the signals more suitable for transfer through, a limited-bandwidth medium. The present invention specifically relates to methods and apparatus useful in video compression systems. Typically, the system determines differences between the current input signals and the previous input signals using mean-square difference signals. These mean-square signals are processed and compared with one or more thresholds for determining one of several modes of operation. After processing in some mode, the processed signals are in the form of digital numbers and these digital numbers are coded, using ordered redundancy coding, and transmitted to a receiver.

46 Claims, 4 Drawing Figures



U.S. Patent Oct. 6, 1987

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4,698,672

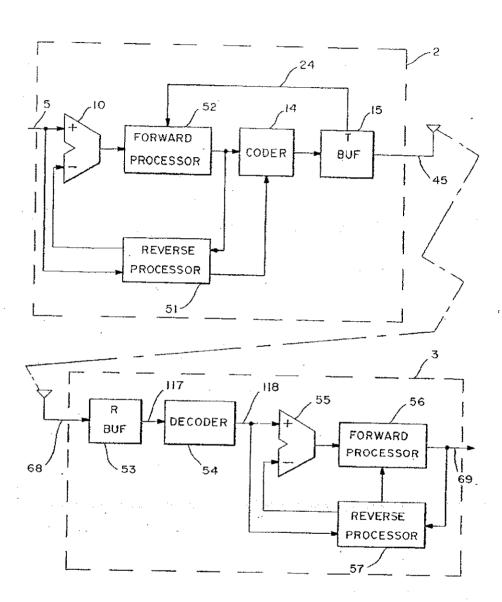
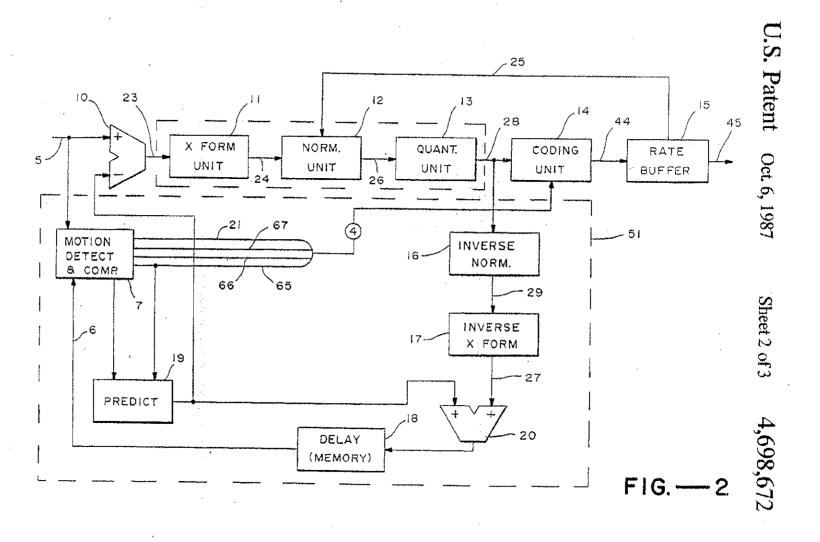


FIG. --- 1



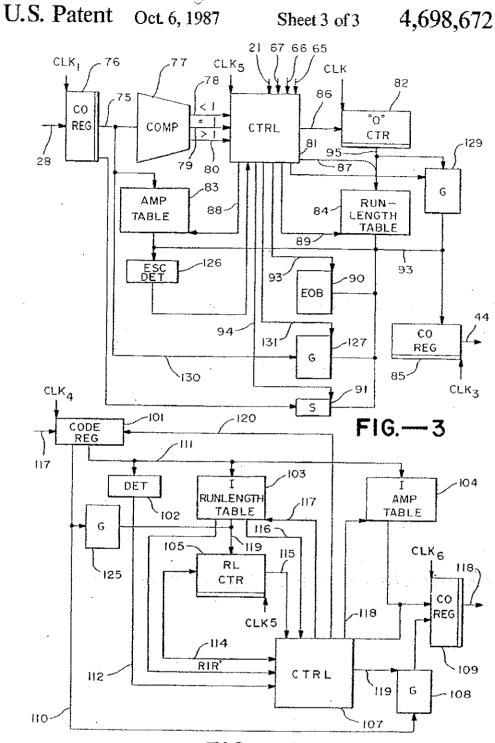


FIG.-4

1

## CODING SYSTEM FOR REDUCING REDUNDANCY

### CROSS-REFERENCE TO RELATED APPLICATION

Title: A COMBINED INTRAFRAME AND INTER-FRAME TRANSFORM CODING SYSTEM Ser. No.: 479,766 Filed: 83/03/28 (now abandoned) Inventors: Wen-hsiung Chen, James Parker Elliott. 10 Robert Edwin George Newell, Ralph Emerson Nichols, Albert Edwards Rackett

## BACKGROUND OF THE INVENTION

The present invention relates to methods and appara- 15 tus for processing signals to remove redundant information thereby making the signals more suitable for transfer through a limited-bandwidth medium. The present invention specifically relates to methods and apparatus useful in video compression systems.

Many signal processing techniques useful in video compression systems are known. For example, digital encoding is often employed in processing television signals which are to be transferred over transmission channels since digital data streams are more immune to 25 noise degradation.

In order to digitally encode a television signal, a signficant number of bits, 4 or more, may be required to provide for an acceptable range of gray scale for each of the hundreds of thousands of separate picture elements 30 (pixels) which form an image. Consequently, data rates for unprocessed digitalized television signals typically require a bandwidth greater than 40 megabits per second. If the communications link is an earth satellite, an unprocessed video signal typically occupies nearly the 35 entire bandwidth of the satellite, with very few channels, if any, left over for other uses. A T1 communication channel is typical and has only a 1.5 megabit per second bandwidth. A practical yet effective way to reduce the bandwidth of digitalized television signals is 40 needed so that fewer channels are required for transmission over a communications path and so that the quality of transmitted signals is maintained even when reduced bandwidth transmission is employed.

U.S. Pat. No. 4,302,775, assigned to the same assignee 45 as the present invention, describes a scene adaptive coding technique which eliminates redundant information and thereby reduces the bandwidth.

The patent describes a single-pass digital video comcosine transform with intraframe block-to-block comparisons of transform coefficients without need for preliminary statistical matching or preprocessing.

Each frame of the video image is divided into a predetermined matrix of spatial subframes or blocks. The 55 system performs a spatial domain to transform domain transformation of the picture elements of each block to provide transform coefficients for each block. The system adaptively normalizes the transform coefficients so that the system generates data at a rate determined 60 adaptively as a function of the fullness of a transmitter buffer. The transform coefficient data thus produced is encoded in accordance with amplitude Huffman codes and zero-coefficient runlength Huffman codes which are stored asynchronously in the transmitter buffer. The 65 encoded data is output from the buffer at a synchronous rate for transmission through a limited-bandwidth medium. The system determines the buffer fullness and

adaptively controls the rate at which data is generated so that the buffer is never completely emptied and never completely filled.

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In the system receiver, the transmitted data is stored in a receiver buffer at the synchronous data rate of the limited-bandwidth medium. The data is then output from the receiver buffer asynchronously and is decoded in accordance with an inverse of the encoding in the transmitter. The decoded data is inversely normalized and inversely transformed to provide a representation of the original video image.

The U.S. Pat. No. 4,302,775 patents reduces redundancy by employing intraframe coding techniques utilizing intraframe comparisons of cosine transform coefficients. While the patent provides significant improvement over other techniques, there is a need for even greater compression.

In addition to intraframe coding techniques, interframe coding techniques have been used to reduce the rate required for video transmission as described, for example, in the above-identified application. Typically, each video frame is held in memory at both the transmitter and the receiver and only frame-to-frame changes are transmitted over the communication link. In contrast to intraframe coding schemes in which the quality of coded images is dependent upon the amount of detail in each single image frame, the quality of the coded image in interframe coding is dependent upon the differences from frame to frame. Frame-to-frame differences are often referred to as "motion".

Interframe coding techniques are broadly classified into two categories, namely, spatial domain coding and transform domain coding. In real-time interframe spatial-domain coding systems, spatial domain data can be threshold processed to obtain and store frame difference signals in a transmitter buffer. The threshold value can be adaptively determined as a function of the transmitter buffer fullness. In order to eliminate the image breakdown, both spatial and temporal subsampling has been proposed.

The above-identified U.S. patent application entitled "A Combined Intraframe and Interframe Transform Coding System" employs intraframe and interframe variable prediction transform coding. Images are represented by sequential frames of two-dimensional arrays of digital signals. The digital signals are transformed to form transform coefficients for each frame. Predicted transform coefficients are formed using sets of variable pression system which implements a two-dimensional 50 prediction factors. The predicted transform coefficients for each frame are compared with corresponding actual transform coefficients for the frame to form transform coefficient difference signals. The difference signals are processed to control their range of values. The processed difference signals are statistically coded such that the more frequently occurring values are represented by shorter code lengths and the less frequently occurring values are represented by longer code lengths. The coded signals are stored in a buffer memory for transmission. The coded signals in the buffer memory are transmitted, over a limited-bandwidth medium, to the receiver along with processing information. The processing information includes codes identifying the set of variable prediction factors utilized in the transmitter. The same set of variable prediction factors is utilized in the receiver to reconstruct predicted transform coefficients which in turn are used to reconstruct representations of the original images in the transmitter.